

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT**

**CASE NO.: 23—10425DD**

SYLVAN PLOWRIGHT  
Plaintiff,

v.

MIAMI-DADE COUNTY,  
A Political subdivision of the  
State of Florida and ALFREDO RAMIREZ III,  
CHIEF MDPD, officers  
L. RONDON and A. CORDOVA  
Defendants.

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**MOTION TO FILE CIVIL APPEAL STATEMENT**

COMES NOW the appellant, by and through the undersigned  
counsel, and files this Motion To File Civil Appeal Statement out of  
time and would state as grounds therefore the following:

1. The undersigned counsel received approval of his  
admission application February 24, 2023.
2. The fees for admission were paid today by the undersigned.
3. The Civil Appeal Statement and Certificate of Interested  
Parties are attached to be filed today.

WHEREFORE the undersigned counsel request permission to file the above  
mentioned documents out of turn.

CERTIFICATE OF SERVICE

I hereby certify that on this FEBRUARY 28 2023 I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record for service via transmission of Notices of Electronic filing generated by CM/ECF.

/s/ William C. Robinson

WILLIAM C. ROBINSON, ESQ  
Florida Bar No: 386847  
Attorney for Plaintiff  
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U.S. COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

CERTIFICATE OF INTERESTED PERSONS  
AND CORPORATE DISCLOSURE STATEMENT (CIP)

PLOWRIGHT vs. MIAMI DADE Appeal No. 23-10425

11th Cir. R. 26.1-1(a) requires the appellant or petitioner to file a Certificate of Interested Persons and Corporate Disclosure Statement (CIP) with this court within 14 days after the date the case or appeal is docketed in this court, and to include a CIP within every motion, petition, brief, answer, response, and reply filed. Also, all appellees, intervenors, respondents, and all other parties to the case or appeal must file a CIP within 28 days after the date the case or appeal is docketed in this court. **You may use this form to fulfill these requirements.** In alphabetical order, with one name per line, please list all trial judges, attorneys, persons, associations of persons, firms, partnerships, or corporations that have an interest in the outcome of this case or appeal, including subsidiaries, conglomerates, affiliates, parent corporations, any publicly held corporation that owns 10% or more of the party's stock, and other identifiable legal entities related to a party.

*(please type or print legibly):*

SYLVAN PLOWRIGHT

WILLIAM C ROBINSON

ERICA ZARON

MIAMI DADE COUNTY

JUDGE K M MOORE

Rev. 4/18

UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT  
**CIVIL APPEAL STATEMENT**

Please TYPE. Attach additional pages if necessary.

11th Circuit Docket Number: 23 - 10425 D D \_\_\_\_\_

Caption:  
PLOWRIGHT

V.

MIAMI DADE

District and Division: SOUTHERN DISTRICT OF FLORIDA  
Name of Judge: K. M MOORENature of Suit: ☐ CIVIL RIGHTS

Date Complaint Filed: 1/17/22

District Court Docket Number: 22-CV-20203

Date Notice of Appeal Filed: 2 / 8 / 23

☐ Cross Appeal ☐ Class Action

Has this matter previously been before this court?

☐ Yes ☒ No

If Yes, provide

(a) Caption: \_\_\_\_\_

(b) Citation: \_\_\_\_\_

(c) Docket Number: \_\_\_\_\_

☐  
☐  
☐

Attorney Name

Mailing Address

Telephone, Fax, Email

For Appellant:

XXX Plaintiff WILLIAM C ROBINSON P.O BOX 610575 N MIAMI FLA 33261  
3054549632 Robinsonwilliam8@gmail.com☐ Defendant☐ Other (Specify)For Appellee: ERICA S. ZARON 111 NW 1<sup>ST</sup> ST MIAMI FLA 33130

3053755151 ERICA.ZARON@MIAMIDADE.GOV

☐ Plaintiff☐ Defendant☐ Other (Specify)

Please CIRCLE/CHECK/COMPLETE the items below and on page 2 that apply.

Jurisdiction	Nature of Judgment	Type of Order	Relief
<input type="checkbox"/> XX Federal Question	<input type="checkbox"/> Final Judgment, 28 USC 1291	<input checked="" type="checkbox"/> Dismissal/Jurisdiction	Amount Sought by Plaintiff: \$200K
<input type="checkbox"/> Diversity	<input type="checkbox"/> Interlocutory Order, 28 USC 1292(a)(1)	<input type="checkbox"/> Default Judgment	Amount Sought by Defendant: \$
<input type="checkbox"/> US Plaintiff	<input type="checkbox"/> Interlocutory Order Certified, 28 USC 1292(b)	<input type="checkbox"/> Summary Judgment	Awarded: <input type="checkbox"/>
<input type="checkbox"/> US Defendant	<input checked="" type="checkbox"/> Interlocutory Order, Qualified Immunity	<input type="checkbox"/> Judgment/Bench Trial	<input type="checkbox"/> \$
	<input type="checkbox"/> Final Agency Action (Review)	<input type="checkbox"/> Judgment/Jury Verdict	<input type="checkbox"/> to
	<input type="checkbox"/> 54(b)	<input type="checkbox"/> Judgment/Directed Verdict/NOV	Injunctions:
		<input type="checkbox"/> Injunction	<input type="checkbox"/> TRO
		<input type="checkbox"/> Other _____	<input type="checkbox"/> Preliminary <input type="checkbox"/> Granted
			<input type="checkbox"/> Permanent <input type="checkbox"/> Denied

Page 2

11th Circuit Docket Number: \_\_\_\_\_

Based on your present knowledge:

- (1) Does this appeal involve a question of First Impression? ☐ Yes ☒ No  
What is the issue you claim is one of First Impression? \_\_\_\_\_

- (2) Will the determination of this appeal turn on the interpretation or application of a particular case or statute? ☐ Yes ☒ No

If Yes, provide

(a) Case Name/Statute \_\_\_\_\_

(b) Citation \_\_\_\_\_

(c) Docket Number if unreported \_\_\_\_\_

- (3) Is there any case now pending or about to be brought before this court or any other court or administrative agency that  
(a) Arises from substantially the same case or controversy as this appeal? ☐ Yes ☒ No  
(b) Involves an issue that is substantially the same, similar, or related to an issue in this appeal? ☐ Yes ☒ No

If Yes, provide

(a) Case Name \_\_\_\_\_

(b) Citation \_\_\_\_\_

(c) Docket Number if unreported \_\_\_\_\_

(d) Court or Agency \_\_\_\_\_

- (4) Will this appeal involve a conflict of law  
(a) Within the Eleventh Circuit? ☐ Yes ☒ No  
(b) Among circuits? ☐ Yes ☒ No

If Yes, explain briefly:

- (5) Issues proposed to be raised on appeal, including jurisdictional challenges:

*Qualified and Sovereign Immunity  
Implementation of Training By Government*

I CERTIFY THAT I SERVED THIS CIVIL APPEAL STATEMENT ON THE CLERK OF THE U.S. COURT OF APPEALS FOR THE ELEVENTH CIRCUIT AND  
SERVED A COPY ON EACH PARTY OR THEIR COUNSEL OF RECORD, THIS 28 DAY OF FEB 2023.

*William C. Robinson*

NAME OF COUNSEL (Print)



SIGNATURE OF COUNSEL